

1 **Marquis Aurbach**
2 Craig R. Anderson, Esq.
3 Nevada Bar No. 6882
4 Jackie V. Nichols, Esq.
5 Nevada Bar No. 14246
6 10001 Park Run Drive
7 Las Vegas, Nevada 89145
8 Telephone: (702) 382-0711
9 Facsimile: (702) 382-5816
10 canderson@maclaw.com
11 jnichols@maclaw.com
12 Attorneys for Defendants Las Vegas Metropolitan Police
13 Department, Andrew Bauman, Matthew Kravetz, Supreet Kaur,
14 David Jeong, and Theron Young

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

10 CONNIE SEMPER¹, an individual; ASHLEY
MEDLOCK, an individual; LONICIA
11 BOWIE, an individual; MICHAEL GREEN,
an individual; CLINTON REECE, an
individual; COREY JOHNSON, an
individual; DEMARLO RILEY, an
individual; CORY BASS, an individual;
13 CARLOS BASS, an individual; BREANNA
NELLUMS, an individual; and ANTONIO
14 WILLIAMS, an individual.

Case Number:
2:20-cv-01875-JCM-EJY

**LVMPD DEFENDANTS' UNOPPOSED
MOTION TO EXTEND OPPOSITION
TO PLAINTIFFS' MOTION TO
STRIKE OR, IN THE ALTERNATIVE,
FOR CLARIFICATION**

(SECOND REQUEST)

Plaintiffs

VS.

18 LAS VEGAS METROPOLITAN POLICE
19 DEPARTMENT, in its official capacity;
20 ANDREW BAUMAN, individually and in
21 his capacity as a Las Vegas Metropolitan
22 Police Department Officer; DAVID JEONG,
23 individually and in his capacity as a Las
24 Vegas Metropolitan Police Department
25 Officer; SUPREET KAUR, individually and
in his capacity as a Las Vegas Metropolitan
Police Department Officer; MATTHEW
KRAVETZ, individually and in his capacity
as a Las Vegas Metropolitan Police
Department Officer; and THERON YOUNG,
individually and in his capacity as a Las
Vegas Metropolitan Police Department
Officer.

Defendants.

²⁷ Pursuant to FRCP 25, Ms. Semper has been substituted for Phillip Semper pursuant to this court's
²⁸ order date January 13, 2022, as she is the executrix of his estate.

**LVMPD DEFENDANTS' UNOPPOSED MOTION TO EXTEND OPPosition TO
PLAINTIFFS' MOTION TO STRIKE OR, IN THE ALTERNATIVE, FOR
CLARIFICATION**

(SECOND REQUEST)

4 Defendants, the Las Vegas Metropolitan Police Department (the “Department” or
5 “LVMPD”), Sheriff Joseph Lombardo (“Lombardo”), Andrew Bauman (“Bauman”),
6 Matthew Kravetz (“Kravetz”), Supreet Kaur (“Kaur”), David Jeong (“Jeong”), and Theron
7 Young (“Young”), collectively (“LVMPD Defendants”), by and through their attorneys of
8 record, the law firm of Marquis Aurbach, hereby submit their Unopposed Motion to Extend
9 its Opposition to Plaintiffs’ Motion to Strike or, in the Alternative, for Clarification [ECF
10 No. 156].

11 This Motion is made and based upon all papers, pleadings, and records on file herein,
12 the attached Memorandum of Points and Authorities, and any oral argument allowed at a
13 hearing on this matter.

MEMORANDUM OF POINTS & AUTHORITIES

15 Plaintiffs filed their Motion to Strike or, in the alternative, for Clarification on April
16 13, 2024. ECF No. 156. Counsel for Defendants sought and obtained a three-day extension,
17 from April 26, 2024 to May 1, 2024, to file their Opposition to Plaintiffs' Motion to Strike
18 or, in the alternative, for Clarification. ECF No. 163. Counsel for Defendants reached out to
19 Plaintiffs' counsel seeking an additional one-day extension due to an ongoing health issue.²
20 Plaintiffs' counsel indicated that there was no opposition or objection to the one day
21 additional extension. As indicated previously, courts within this circuit routinely recognize
22 counsel's illness, satisfy the good cause standard for seeking an extension of time. *See e.g.*,
23 *Castronovo-Flihan v. State Farm Mut. Auto. Ins. Co.*, No. 220CV01197JCMDJA, 2021 WL
24 5413886, at *1 (D. Nev. Sept. 17, 2021) (extending deadline because Plaintiff had recently
25 been diagnosed with an autoimmune disease); *Bryson v. Zuniga*, No.
26 220CV00089JADBNW, 2022 WL 225091, at *2 (D. Nev. Jan. 25, 2022) (extending

²⁸ ² Counsel for Defendants can provide additional details to the Court as necessary.

1 deadlines based in part due to counsel's personal family emergencies); *Frary v. Cnty. of*
2 *Marin*, No. 12-CV-03928-MEJ, 2014 WL 2110026, at *1 (N.D. Cal. May 20, 2014)
3 (extending deadlines because counsel had to care for his ill child). Accordingly, the Court
4 should find that good cause exists to extend the Opposition deadline by one day from May 1,
5 2024 to May 2, 2024.

6 This is the second motion for extension of time for LVMPD Defendants' Opposition
7 to Plaintiffs' Motion to Strike or, in the Alternative, for Clarification. Furthermore, counsel
8 for Defendants conferred with Plaintiffs' counsel and there is no opposition or objection to
9 the one-day extension sought..

10 Dated this 1 day of May, 2024.

11 MARQUIS AURBACH

12
13 By:/s/ Jackie Nichols
14 Craig R. Anderson, Esq.
15 Nevada Bar No. 6882
16 Jackie V. Nichols, Esq.
17 Nevada Bar No. 14246
18 10001 Park Run Drive
19 Las Vegas, Nevada 89145
20 Attorneys for Defendants Las Vegas
21 Metropolitan Police Department, Andrew
22 Bauman, Matthew Kravetz, Supreet Kaur,
23 David Jeong, and Theron Young

24 IT IS SO ORDERED.

25
26
27
28 
U.S. MAGISTRATE JUDGE

Dated: May 2, 2024